

EXHIBIT 14

Carter, Sean

From: Eric L. Lewis <Eric.Lewis@lewisbaach.com>
Sent: Wednesday, May 1, 2013 3:02 PM
To: Carter, Sean
Cc: Mark J. Leimkuhler; Aisha Henry
Subject: 9/11 MDL - IIRO/MWL

Dear Sean,

We wanted to follow-up with you regarding our conversation at the April 16 status conference. You mentioned that your team had informally agreed in principle to an additional period of discovery for IIRO and MWL, geared towards addressing any remaining deficiencies perceived in their current productions. I suggested a 6-month supplemental discovery period and you said that would likely work but again subject to discussion with your colleagues. Of course, the 2d Circuit decisions came down the same day and we all needed to consider the impact on discovery, given that there was likely to be a period for jurisdictional discovery for the numerous individual defendants brought back in the case.

We also discussed that we would need to reach an agreement as to what this follow-up discovery would entail and we'd like to hear from you as soon as possible as to what you think our clients ought to be looking for so that we are all on the same page and there are no surprises at the conclusion of the period. As I said, we have a sense of where we think our clients could improve their record but obviously you may have different views and it would seem to make sense that we have the same expectations in order to bring this phase to a satisfactory closure and get on with the merits. There is also the additional consideration of the jurisdictional discovery with respect to the remanded individuals formerly and presently associated with MWL and we can discuss that issue with you as well, in conjunction with Alan Kabat and Lynne Bernabei. Our expectation would be that we would work out an agreement with you over the next 3 weeks or so, loop in our respective co-parties as necessary, include the issue as an item in the pre-conference agenda letter, and be prepared to move the Court on May 30 to adopt a supplemental production schedule.

I will be out of the country next week, but feel free to contact my partners Mark Leimkuhler or Aisha Henry in my absence. I am also reachable by email or cell phone, 202 352 8900.

We look forward to hearing from you.

Regards,
Eric

Eric L. Lewis

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Please note our new mailing address